



Via email to debra.morrell@ct.gov

October 25, 2013

Karla McManus
New Hampshire Department of Environmental Services
Air Resources Division
29 Hazen Drive,
Concord, NH 03302

RE: *Env-A 4600, Carbon Dioxide Budget Trading Program; Env-A 4700, Carbon Dioxide Offset Projects; and Env-A 4800, Carbon Dioxide Allowance Auction Program*

Dear Ms. McManus,

The New England Clean Energy Council is writing to urge you to readopt with amendments the Regional Greenhouse Gas Initiative (RGGI) Rules (*Env-A 4600, Carbon Dioxide Budget Trading Program; Env-A 4700, Carbon Dioxide Offset Projects; and Env-A 4800, Carbon Dioxide Allowance Auction Program*) that have been filed with the New Hampshire Office of Legislative Services. These rules will promulgate the law passed earlier this year to reduce New Hampshire's RGGI cap by 45 percent, as agreed by the New England Governors in February 2013.

Moving these regulations forward will ensure real reductions in greenhouse gas emissions while providing important economic benefits to New Hampshire citizens. Independent analysis has shown that overall the RGGI program has already created \$1.6 billion in economic value and set the stage for \$1.1 billion in ratepayer savings through investments in efficiency and renewable energy. In addition, the program showed a positive employment impact of approximately 16,000 new job-years and reduced payments to out-of-region providers of fossil fuels by just over \$765 million. The report indicated that RGGI resulted in a net positive economic value of \$17 million for New Hampshire.

We urge you to adopt these rules to implement the law passed by the New Hampshire legislature and signed by Governor Hassan, keeping New Hampshire compliant with RGGI's new model rule.



Reducing the cap to this agreed level will increase the value of emissions allowances (permits to pollute that are the currency of the RGGI system). The higher the amount of money received by the state for sale of allowances, the more net economic gain there is for New Hampshire. Without the reduction in the cap that these rules implement, New Hampshire will not be able to take full advantage of the economic and environmental benefits of RGGI. We strongly urge you to adopt these rules and move forward with a reduction in the emissions cap.

We appreciate your consideration and thank you for your leadership in strengthening RGGI.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Rothstein".

Peter Rothstein
President

A handwritten signature in black ink, appearing to read "Janet Gail Besser".

Janet Gail Besser
Vice President, Policy and Government Affairs